

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

In re	§	
	§	
PASO DEL NORTE MATERIALS, LLC,	§	Case No. 23-30252-HCM-11
	§	
Debtor.	§	

**REQUEST FOR VALUATION WITNESS TO APPEAR
BY WEBEX OR TELEPHONICALLY**

TO THE HONORABLE H. CHRISTOPHER MOTT, UNITED STATES BANKRUPTCY JUDGE:

Now comes J.A.R. CONCRETE, INC. and through its attorney undersigned files this Request for Valuation Witness to Appear by WebEx or Telephonically, and would respectfully show:

1.

Set for Wednesday, June 28, 2023 at 1:00 p.m. (MT) is 1ST SOURCE BANK's Motion for Relief from Stay (Doc. #115).

2.

The Debtor requests that SEAN KELLEY, a Certified Equipment Appraiser whom it has applied to employ in these proceedings, be permitted to appear telephonically so that he may serve as an expert witness as to the valuation of the equipment secured by 1ST SOURCE BANK.

3.

It will be expensive and time-consuming for SEAN KELLEY to travel round-trip from his business address in Tomball, Texas to El Paso, Texas to attend in person the hearing upon this Motion for Relief from Stay.

4.

The undersigned attorney will be responsible for informing Mr. KELLEY on how he can call into the Court for that hearing or appear via Web-Ex, if he is allowed to appear either way.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that this Request for Valuation Witness to Appear via Web-Ex or Telephonically be granted.

Respectfully submitted this 27th day of June, 2023.



E.P. BUD KIRK
State Bar No. 11508650
600 Sunland Park Drive
Bldg. Four, Suite 400
El Paso, TX 79912
(915) 584-3773
(915) 581-3452 facsimile
budkirk@aol.com

Attorney for Debtor-in-Possession

CERTIFICATE OF SERVICE

I do hereby certify that on the 27th day of June, 2023, I did cause a copy of the following Request for Valuation Witness to Appear Telephonically to be mailed by postage pre-paid U.S. Mail to U.S. Trustee, 615 E. Houston St., Ste. 533, San Antonio, TX 78205-1539; to Paso Del Norte Materials, LLC, 8000 Escobar, El Paso, TX 79907; and to 1st Source Bank, c/o Jarom J. Yates, 2323 Victory Avenue, Suite 700, Dallas, TX 75219.



E.P. BUD KIRK

4988-LC-062623